

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ACL1 INVESTMENTS LTD., *et al.*,  
  
Plaintiffs,  
  
v.  
  
BOLIVARIAN REPUBLIC OF VENEZUELA,  
  
Defendant.  
  
\_\_\_\_\_

No. 19-cv-09014-LLS

~~STIPULATION AND~~  
PROPOSED ORDER

LLS

WHEREAS, the Court entered a stipulation on September 14, 2020 adjourning until October 15, 2020 the time for Defendant Bolivarian Republic of Venezuela (the "Republic") to answer Plaintiffs' Complaint in order to allow the parties to conduct informal discovery, Dkt. 46;

WHEREAS, Plaintiffs filed a First Amended Complaint (the "FAC") on October 14, 2020, Dkt. 47;

WHEREAS, the Republic's response to the FAC is due on October 28, 2020;

WHEREAS, the parties have reached agreement in principle for a partial resolution of the claims asserted in the FAC;

WHEREAS, the parties agree that an adjournment of the Republic's time to answer or otherwise respond to the FAC would facilitate the parties' efforts to finalize and document their agreement and to continue to conduct discussions regarding the possibility of resolving the remaining claims;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendant, by their undersigned counsel, that:

1. Defendant's time to answer or otherwise respond to the Complaint is adjourned *sine die*.
2. Either party may terminate the adjournment upon seven (7) days' written notice, and upon such termination the Action will revert to its status as of submission of this Stipulation and [Proposed] Order by the parties.
3. This Stipulation may be executed in counterparts and electronic signatures shall be deemed as an original execution.

Dated: October 27, 2020  
New York, New York

SULLIVAN & CROMWELL LLP

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*Attorneys for Defendant Bolivarian Republic of  
Venezuela*

Dated: October 27, 2020  
Washington, D.C.

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*Attorneys for Plaintiffs*

SO ORDERED this 4<sup>th</sup> day of Nov, 2020.

Louis L. Stanton  
Honorable Louis L. Stanton  
United States District Court Judge